KIRTON LAW FIRM

Marlon G. Kirton, Esq.

Nassau County:

175 Fulton Avenue, Suite 305 Hempstead, New York 11550 Tel. # (516) 833-5617

Fax # (516) 833-5620

May 3, 2021

VIA ELECTRONIC FILING

Honorable Paul G. Gardephe United States District Judge Thurgood Marshall United States Courthouse Southern District of New York 40 Foley Square New York, NY 10007 **MEMO ENDORSED**

The Application is granted.

PROFEED:

Paul G. Gardephe, U.S.D.J.

Dated: May 4, 2021

Re: United States v. Alexei Saab, 19 cr. 676 (PGG)

Dear Judge Gardephe:

I represent Alexei Saab in the above-referenced matter. The defense requests a one-week extension to file pretrial motions.

The defense requested an opportunity to file pretrial motions based on the Government's February 8, 2021 disclosure. The defense was scheduled to file on or before May 5, 202. The defense needs additional time to file motions. There is outstanding information required to complete the defense filing. The Government consents to the extension. The defense proposes the following revised schedule:

- 1. Defense file on or before May 12, 2021.¹
- 2. Government response due on or before June 4, 2021.
- 3. Defense reply due on or before June 11, 2021.
- 4. Return date June 21, 2021.²

Please contact me if you have any questions or concerns.

Sincerely,

¹ The parties consulted with each other regarding the proposed dates.

² This proposed date was the same as the original date.

<u>s/Marlon G. Kirton</u> Marlon G. Kirton, Esq.

cc: Jessica Fender, Assistant United States Attorney (via electronic mail) Jason Richman, Assistant United States Attorney (via electronic mail) Esere Onaodowan, Esq. (via electronic mail)